

JUSTIN C. BONUS, ESQ.

A T T O R N E Y A T L A W

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October 17, 2019

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse – Room 14A
500 Pearl St.
New York, NY 10007-1312

Via ECF & Fax (212) 805-7912

Re: 1:18-cr-00662-JGK USA v. Jones
Subj.: Michael Jones' Video Taped Statement

Dear Honorable Koeltl:

As you know, this office represents Michael Jones in the above-captioned matter. Mr. Jones moves to limit the Government's attempt to only submit selective portions of Mr. Jones' statement to the jury. Pursuant to Rule 1002, it is Mr. Jones' position that the Government must submit the entire videotaped statement into evidence. The selective cuts were edited in a way that did not accurately represent the conversations. As such, if the Government wants to use the video as evidence during the testimony of James Mannick, it should submit the entire video as evidence. There is no need to merely provide selections.

I appreciate your consideration in this matter.

Sincerely,

JUSTIN BONUS, ESQ.

/s/ Justin Bonus
Justin Bonus, Esq.

VIA ECF & EMAIL
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